

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

KATHY DYER and ROBERT DYER,	§	
Individually and as Representative of the	§	
Estate of Graham Dyer,	§	
Plaintiffs,	§	
	§	
v.	§	Cause No. 3:15-CV-02638-B
	§	
ALAN GAFFORD, et. al.	§	
Defendants.	§	

**DEFENDANTS' EXHIBIT LIST**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW Defendants who make and file this Exhibit List pursuant to the Scheduling Order of this Honorable Court. For same, Defendants present the following:

Exhibit	Tendered	Admitted	Denied
1. Excerpted copy of video from school surveillance camera depicting encounter at school yard. (00:00 through 11:50)	_____	_____	_____
Plaintiffs agree to the admissibility of this exhibit.			
2. Autopsy Report.	_____	_____	_____
Plaintiffs agree to the admissibility of this exhibit.			
3. Excerpted copy of video from Gafford's police dash cam depicting PD sallyport. (0:50 through 4:06).	_____	_____	_____
Plaintiffs agree to the admissibility of this exhibit.			
4. Mesquite PD arrest report for Graham Dyer.	_____	_____	_____
Plaintiffs agree to the admissibility of this exhibit.			

5. PD video of book-in area. \_\_\_\_\_

Plaintiffs agree to the admissibility of this exhibit.

6. PD video of jail corridor. \_\_\_\_\_

Plaintiffs agree to the admissibility of this exhibit.

7. PD video of jail corridor, 2. \_\_\_\_\_

Plaintiffs agree to the admissibility of this exhibit.

8. PD video of padded cell. \_\_\_\_\_

Plaintiffs agree to the admissibility of this exhibit.

9. (Contingent upon the Court's ruling on Defendant's Motion in Limine, Defendants may withdraw this exhibit) Demonstration (seat belt) video from McNear report.

\_\_\_\_\_

Contingent upon the Court's ruling on Defendants' Motion in Limine, Plaintiffs object to this exhibit on grounds of relevancy.

10. Mesquite PD investigative summary prepared by Corder. \_\_\_\_\_

Plaintiffs agree to the admissibility of this exhibit.

Certificate of Conference: On July 08<sup>th</sup>, 2021, lead counsel for Plaintiffs and Defendants conferred at length and in person regarding the Parties' respective proposed exhibits herein. The statements above reflect the results of that conference.

Respectfully submitted,

By: /s/ Joe C. Tooley

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ATTORNEY FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been forwarded to all counsel of record in accordance with the Federal Rules of Civil Procedure, as modified by this Court's ECF Orders, on this 16<sup>th</sup> day of July, 2021.

**/s/ Joe C. Tooley**